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9 Attorneys for Plaintiff

10 **IN THE UNITED STATES BANKRUPTCY COURT**

11 **FOR THE DISTRICT OF ARIZONA**

12 In re:

13 QUINTIN DESMOND GRAY and VICKIE  
14 LYNN GRAY aka VICKIE LYNN  
15 MATTIER,

16 Debtors.

17 DALE D. ULRICH, CHAPTER 7  
18 TRUSTEE,

19 Plaintiff,

20 vs.

21 QUINTIN DESMOND GRAY and VICKIE  
22 LYNN GRAY aka VICKIE LYNN  
23 MATTIER,

24 Defendants.

(Chapter 7 Case)

No. 2:16-bk-09911-DPC

Adv. No.

**COMPLAINT FOR REVOCATION OF  
DISCHARGE**

25 Dale D. Ulrich, Chapter 7 Trustee and Plaintiff, by and through his counsel, Lane & Nach, P.C.,  
26 for his Complaint against Defendants, respectfully alleges as follows:

- 27 1. Plaintiff consents to the jurisdiction of this Court pursuant to Fed.R.Bankr.P. 7008.
- 28 2. This adversary proceeding has been referred to this Court pursuant to 28 U.S.C. §157(a).
3. Venue of this adversary proceeding is proper in this District pursuant to 28 U.S.C. §1409(a).
4. Pursuant to Fed.R.Bankr.P. 7001, a proceeding to recover money or property is governed by Part VII of Fed.R.Bankr.P.
5. The Plaintiff is permitted to bring this adversary proceeding on behalf of the Estate pursuant to

1 Fed.R.Bankr.P. 6009.

2 6. This case was commenced by voluntary petition filed by Quintin Desmond Gray and Vickie  
3 Lynn Gray aka Vickie Lynn Mattier under Chapter 7 of Title 11, United State Code, on August 26, 2016  
4 (“**Defendants**”).

5 7. Dale D. Ulrich is the duly appointed and acting Trustee in this Chapter case (“**Plaintiff**”).

6 8. Upon information and belief, Defendants are residents of the State of Nevada. All acts  
7 complained of herein were done for the benefit of and on behalf of the Defendants' marital community.

8 9. All events complained of herein occurred in this District.

9 10. Debtors received their discharge on December 12, 2016.

10 11. Pursuant to 11 U.S.C. §727(d)(3), Plaintiff seeks to have the Defendants' discharge revoked  
11 on the grounds that the Defendants have failed, despite proper notice and demand, to comply with this  
12 Court's Order Approving Trustee's Application for Authority to Enter into a Compromise with the  
13 Debtors dated March 6, 2018 [DE 48] (“Order”). In accordance with the Order, the Debtors were to  
14 turnover the sum of \$4,032.00 to the Trustee.

15 12. The Defendant has been provided with sufficient opportunity within which to comply with  
16 said Order and have intentionally failed to do so.

17 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

18 A. Revoking the Defendants' discharge effective upon the entry of Judgment;

19 B. For such other and further relief as this Court deems just and proper.

20 RESPECTFULLY SUBMITTED this 12th day of February, 2019.

21 **LANE & NACH, P.C.**

22 By /s/ MPL 007435  
23 Michael P. Lane  
24 Attorney for Plaintiff  
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